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June 21, 2022

VIA ECF UPLOAD

The Honorable Michael M. Baylson, U.S.D.J.
Eastern District of Pennsylvania
601 Market Street
Philadelphia, PA 19106

Re: **Z.M. v. Archdiocese of New York**
No.: **2:22-cv-02310-MMB**
Our File No.: **CMG-016**
Date of Loss: **September 6, 2020**

Dear Judge Baylson:

Please be advised that we represent Defendant Archdiocese of New York, in the above-referenced action. Defendant respectfully requests that this Honorable Court extend the applicable deadlines in this matter and allow Defendant thirty (30) days to serve a responsive pleading pursuant to Rule 12.

Preliminary and based on Plaintiff's Complaint, Plaintiff's causes of action arise out of multiple alleged sexual abuses of Plaintiff by former priest James Garisto ¶1. Plaintiff has sued The Archdiocese of New York. The Archdiocese of New York is not a proper party to this matter. Pursuant to ¶2 of Judge Baylson's Pre-trial and Trial Procedure - Civil Cases "Motions to Dismiss, amend, transfer, add parties, and other threshold motions should be filed, whenever possible, before the Preliminary Pre-trial conference." To date, the Preliminary Pre-trial conference has not been scheduled.

Therefore, and based the above, Defendants respectfully ask Your Honor to allow Defendant thirty (30) days to serve a responsive pleading pursuant to Rule 12.

Thank you for your consideration in this matter.

Respectfully submitted,

LICARDO E. GWIRA, ESQ.

LEG/gg

cc: AJ Thomson, Esq. (via electronic and regular mail)